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BY ECF

Nicole Argentieri Rachel Nash Allon Lifshitz Assistant United States Attorneys Eastern District of New York 271 Cadman Plaza East Brooklyn, New York 11201

Re: United States v. Persico, et al., S-4 10 Cr. 147 (SLT)

Dear Government Counsel:

As you know, we are awaiting receipt of documentation previously requested relating to the charges advanced in Racketeering Acts One and Two of Count One. We also ask that you produce any and all additional recordings made by cooperating witness Kenneth Geller. From the evidence produced thus far, it appears that Geller made at least 109 consensual recordings between 1990 and February 1991 of which the government has thus far produced only 61. Please provide the remainder of the recordings immediately.

Very truly yours, /s/ Sarita Kedia

Paul Shechtman